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VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: NOTICE OF EX-PARTE COMMUNICATION

In the Matter of Facilitating the Development of Text-to-911 and Other Next Generation 911 Applications, PS Docket No. 11-153; and *In the Matter of Framework for Next Generation 911 Deployment*, PS Docket No. 10-255.

Dear Ms. Dortch:

Yesterday, William Brown, Joe Marx, and I of AT&T Services, Inc. ("AT&T") met with David Furth, Tim May, Dana Zelman, Dave Siehl, and Zenji Nakazawa of the FCC's Public Safety and Homeland Security Bureau, and Henning Schulzrinne of the Office of Strategic Planning and Policy Analysis. Participating in the meeting via telephone were Mike Ernst of AT&T and Nicole McGinnis of the FCC's Wireless Telecommunications Bureau. The primary purpose of the meeting was to provide a status update on AT&T's Text-to-911 trial in the state of Tennessee. No attachments were used during the course of this meeting.

In addition, AT&T also raised concerns about how the FCC's recently-adopted Text-to-911 order¹ (and the effective dates of the associated rules) may impact ongoing trials. Specifically, we noted that the mandates for a "temporary shutdown/overload bounceback message" and a "roaming bounceback message"² were not accounted for in the ATIS/TIA joint industry standard solution for text-to-911 services and, thus, will require additional development by ATIS/TIA. We also noted that because these rules take effect on June 28, 2013³, carriers who do not have these requirements accounted for in their text-to-911 trials will be placed in the position of having to discontinue their text-to-911 trials pending further development work, or seek a waiver of the

¹ *In the Matter of Facilitating the Development of Text-to-911 and Other Next Generation 911 Applications*, PS Docket No. 11-153; and *In the Matter of Framework for Next Generation 911 Deployment*, PS Docket No. 10-255, Order, FCC 13-64 (rel. May 17, 2013).

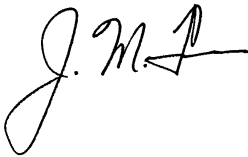
² See 47 CFR §20.18(n)(6) and 47 CFR 20.18(n)(7), respectively.

³ See, e.g. 78 FR 32169 ("This rule is effective June 28, 2013.") cf. 47 CFR §20.18(n)(3) ("No later than September 30, 2013...").

appropriate rules. Finally, we explained how the “roaming bounceback” rule may require additional clarification so that the extent of this obligation is merely for the “home carrier” (i.e. the carrier of the customer originating the message”) to provide a bounceback message about the unavailability of text-to-911 services when customers attempt to send text messages to 911 while roaming.

This letter is being filed in the above-referenced dockets via the FCC’s Electronic Comments Filing System. Should you have any questions regarding the above, please feel free to contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to read "J. M. F." with a stylized flourish at the end.

Cc (via electronic mail):

Mr. David Furth
Mr. Henning Schulzrinne
Mr. Tim May
Ms. Dana Zelman
Mr. David Siehl
Mr. Zenji Nakazawa
Ms. Nicole McGinnis